

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC**

In the matter of:)	
)	MM Docket 99-25
Creation of a low power)	RM-9208
radio service.)	RM-9242
)	

**COMMENTS IN OPPOSITION OF THE MOTION BY NATIONAL PUBLIC
RADIO AND THE CORPORATION FOR PUBLIC BROADCASTING TO
EXTEND THE COMMENT AND REPLY COMMENT DEADLINE**

1. REC Networks ("REC"), a group of people dedicated to bringing radio back to the community formally objects to the motion made by National Public Radio and the Corporation for Public Broadcasting (collectively "NPR/CPB") to extend the comment deadline to August 2, 1999 and the reply comment deadline to September 1, 1999.

2. Back in March, the Commission had already extended the comment deadline at the request of the National Association of Broadcasters, Lucent Technologies and all of the state broadcasting associations.¹ The extension at that time was only partially granted because the public interest would be better served if this proceeding is not severely delayed.²

1 - Commission Order DA 99-542 dated March 19, 1999.

2 - Commission Order DA 99-542 at 4.

3 - RM-9242 Skinner Petition for Rulemaking at 34.

4 - See Appendix A of this document.

3. The current NPR/CPB motion is so they can evaluate receiver performance in respect to the relaxing of second and third adjacent channel restrictions. REC feels that NPR/CPB has already had an ample opportunity for the past several months to conduct this testing. It has been known since RM-9242 that there has been an interest to relax second and third adjacent channel restrictions.³ We ask the Commission and NPR/CPB to look at the current FM dial in Paris, France.⁴ When I visited the city with both a radio with a digital tuner and one with a analog (slide-rule) tuner, I experienced no difficulty selecting between stations with either receiver, even though most stations are full powered and are spaced around 400 kHz apart (2 channels).

4. REC urges the Commission to not allow this proceeding to drag on any longer. All parties involved have had sufficient time to conduct studies and make comments. It's time to move on with this proceeding and the only way to do that is to deny the NPR/CPB motion for an extended comment deadline.

Respectfully Submitted

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APPENDIX A - LIST OF RADIO STATIONS IN PARIS, FRANCE

(List extracted from <http://www.chez.com/lhullier/radio/villes/paris.html>)

87.8 France Inter
88.2 Génération / Paris Jazz Tél : 01.49.59.45.45 / 01.47.39.39.49
88.6 Radio Méditerranée / Soleil Tél : 01.40.18.34.34 / 01.43.48.43.43
89.0 RFI 1
89.4 Radio Libertaire
89.9 TSF
90.4 Nostalgie
90.9 Chante France Tél : 01.53.40.30.30
91.3 Chérie FM
91.7 France Musique
92.1 France Musique
92.6 Média Tropical Tél : 01.48.97.91.00
93.1 Aligre FM / Radio Pays Tél : 01.40.24.29.29 / 01.48.59.22.12
93.9 France Culture
94.3 Radio Orient
94.8 Judaïque FM / Radio J / RCJ (Radio Communauté Juive) / Shalom
95.2 Radio 95.2
95.6 Radio Courtoisie
96.0 Skyrock
96.4 BFM
96.6 Vallée FM Tél : 01.64.11.91.90
96.9 Voltage FM Tél : 01.53.81.23.45
97.4 Rire et Chansons
97.8 Ado FM Tél : 01.45.40.06.23
98.0 Radio Enghien
98.2 F.G. Tél : 01.40.13.88.00
98.6 Alfa Tél : 01.45.10.98.60
99.0 Latina Tél : 01.44.06.99.00
99.5 Ayp / France Maghreb Tél : 01.43.53.20.74 / 01.44.52.76.76
99.9 Sport FM Tél : 01.47.28.26.00
100.3 NRJ
100.7 Fréquence Protestante / Radio Notre-Dame Tél : 01.45.72.60.00 / 01.49.24.10.10
101.1 Radio Classique
101.5 Nova Tél : 01.53.33.33.15
101.9 Fun Radio
102.3 Ouï FM (Dossier : Programmation musicale : l'analyse annuelle d'IPSOS 28 février 98)
102.7 MFM FM
103.1 RMC
103.5 Europe 2
103.9 RFM
104.3 RTL
104.7 Europe 1
105.1 FIP
105.5 France Info
105.9 RTL2
106.3 Fréquence Paris Plurielle
106.7 Beur FM
107.1 Radio Bleue
107.5 Africa n° 1 Tél : 01.45.74.83.83

CERTIFICATE OF SERVICE

This is to certify that this document has been served via US Mail to the following:

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